

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ROBERT KEITH MILLER,

Plaintiff,

v.

CITY OF CHICKASAW, ALABAMA

and

BARRY BROADHEAD, in his individual

and official capacity as Mayor of the

City of Chickasaw,

Defendants.

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Civil Action No.: 1:24-cv-00058-WS-N

JOINT NOTICE OF SETTLEMENT AND REQUEST FOR 30-DAY ORDER

1. Notice of Settlement

Pursuant to the Court's rules and procedures, the Parties, Plaintiff Robert Keith Miller and Defendants City of Chickasaw, Alabama and Mayor Barry Broadhead, by and through their undersigned counsel, respectfully notify the Court that they have reached a settlement in principle resolving all issues in the above-captioned matter.

2. Request for 30-Day Order

The Parties are currently finalizing the terms of a formal Settlement Agreement and preparing a Stipulation of Dismissal. To allow for the completion of these documents and any necessary final actions; *e.g.*, execution of the agreement and exchange of settlement funds, the Parties respectfully request that the Court issue an order providing a 30-day period for the submission of the final dismissal documents.

3. Impact on Case Schedule

The Parties will file a Stipulation of Dismissal with Prejudice upon the full execution of the Settlement Agreement. In light of this settlement, the Parties jointly request that all

deadlines and hearings currently scheduled in the case be vacated.

4. Court Jurisdiction

The Parties anticipate that this matter will be fully resolved and dismissed within the requested 30-day period.

Respectfully submitted,

/s/ Edward L. D. Smith

/s/ with permission Thomas Gaillard

Attorney for Plaintiff

Attorney for Defendants

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CERTIFICATE OF SERVICE

I certify that on this the 2nd day of October, 2025, the foregoing document was electronically filed with CM/ECF which will send email notification to all counsel of record:

/s/ Edward L. D. Smith

EDWARD L. D. SMITH